

Cahoy Dec.
Ex. 95

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: DA VINCI SURGICAL)
ROBOT ANTITRUST LITIGATION) Case No.:
-----) 3:21-cv-03825-VC
THIS DOCUMENT RELATES TO:)
ALL CASES) Pages 1 to 205
-----)
SURGICAL INSTRUMENT SERVICE)
COMPANY, INC.,)
Plaintiff,)
vs.)
INTUITIVE SURGICAL, INC.,)
Defendant.)

DEPOSITION OF:

CLIFTON EARL PARKER, VOLUME I

TUESDAY, OCTOBER 25, 2022

9:08 a.m. Eastern Daylight Time

REPORTED BY:

Vickie Blair

CSR No. 8940, RPR-CRR

JOB NO. 5541122

PAGES 1 - 207

The image consists of a grid of horizontal black bars. There are approximately 20 rows of bars. Each row contains a single long bar on the left and a shorter bar on the right. The bars are solid black and have a thin white border. The pattern repeats across the entire page, creating a rhythmic visual effect.

7	MR. BERHOLD:	Objection.	07:42:56
8	BY MS. WINNER:		07:43:00
9	Q	No?	07:43:00
10	A	No.	07:43:01
11	Q	What were you referring to?	07:43:01
12	A	Remanufacturing has to do with how you	07:43:02
13		modify an instrument that you plan to resell. If it's	07:43:10
14		an instrument that is owned by the hospital and the	07:43:17
15		hospital wants to have that instrument repaired and	07:43:21
16		reset, then that's not considered remanufacturing;	07:43:23
17		that's considered a repair.	07:43:30
18	Q	And that's your position; correct?	07:43:31
19	A	That's my position; that's the same	07:43:33
20		position that Kevin, who handles our regulatory	07:43:37
21		affairs, has come to following the guidance of the FDA	07:43:42
22		blue book memorandum, and he can speak more to that	07:43:47
23		than I can, I'm not an expert on this, going by what	07:43:51
24		I've been told by him, and --	07:43:54
25	Q	Where is -- sorry.	07:43:57

1 STATE OF CALIFORNIA)

2) ss.

3 COUNTY OF LOS ANGELES)

4 I, Vickie Blair, CSR No. 8940, RPR-CRR, in
5 and for the State of California, do hereby certify:

6 That, prior to being examined, the witness
7 named in the foregoing deposition was by me duly sworn
8 to testify as to the truth, the whole truth, and
9 nothing but the truth;

10 That said deposition was taken before me
11 at the time and place therein set forth, and was taken
12 down by me stenographically and thereafter transcribed
13 via computer-aided transcription under my direction and
14 is a true record of the testimony given;

15 I further certify I am neither counsel
16 for, nor related to, any party to said action, nor
17 interested in the outcome thereof;

18 IN WITNESS WHEREOF, I have hereto
19 subscribed my name this 4th day of November, 2022.

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25 Vickie Blair, CSR No. 8940, RPR-CRR